

RELIABILITY STANDARDS DEVELOPMENT PROCEDURES

Introduction

The Western Electricity Coordinating Council (WECC) is a Regional Entity¹ authorized through a delegation agreement between the North American Electricity Reliability Corporation (NERC) and WECC pursuant to Section 215 of the Federal Power Act. NERC delegates designated powers, rights, and responsibilities to WECC regarding the administration within the Western Interconnection of electric Reliability Standards adopted or approved by NERC and the Federal Energy Regulatory Commission (FERC).

These Reliability Standards Development Procedures (Procedures) define the process to be used by WECC for the development, revision, and retirement of Regional Reliability Standards (RRS) and various Other Projects (OP) created under these Procedures.

These Procedures were established to create the structure for open and transparent due process in the development of WECC RRSs and OPs. These Procedures include, but are not limited to, public notice of intent to develop RRSs and OPs, a public comment period on the proposed documents, due consideration of comments provided, and a balanced ballot of interested stakeholders.

The Procedures shall be interpreted and applied in a manner that is consistent with the WECC Bylaws. Should any conflict arise between the Procedures and the WECC Bylaws, the WECC Bylaws will prevail.

Definitions

Ballot Body

That body of qualified WECC Members and non-members that register with WECC for participation in Ballot Pools.

Ballot Pool

That pool of Ballot Body entities that have registered to vote on a specific document.

Day

All references to days are calendar days. When counting the number of days, the count shall exclude the first day of the time window to be measured. If a terminus date falls on a weekend or a day that WECC is scheduled to be closed, the new terminus date shall be the day following the weekend or WECC closure day.

¹ Unless otherwise specified, capitalized terms are defined in the NERC Glossary of Terms Used in Reliability Standards.

For example, if a 15-day period ends on a holiday the terminus date is on the following WECC business day.

Drafting Team (DT)

A team of pertinent subject matter experts (SME) that was appointed by the WECC Standards Committee (WSC) to develop the document(s) that were called for in a Standard Authorization Request (SAR) consider and respond to industry comments, participate in forums to help build consensus on draft documents, and perform other tasks as assigned by the WSC.

Electric Line of Business

The generation, transmission, distribution, or trading of electricity or the provision of related energy services in the Western Interconnection.

NERC Compliance Registry

Registry of the Bulk Electric System owners, operators, and users that are subject to approved reliability standards.

Non-Substantive Changes

A Non-Substantive Change is one that does not change the scope, applicability, intent of the document, or the actions required by affected entities.

For example, Non-Substantive Changes include, but are not limited to; correcting grammar or sentence structure, typographical or spelling errors, font and formatting, numbering, references, adding an obviously missing word, or rephrasing a statement to improve its clarity. Non-Substantive Changes do not require, but may receive posting for comments and/or revision of the document under these Procedures.

Other Projects (OP)

Any document type other than an RRS developed under these Procedures. These include, but are not limited to, WECC Criteria.

Participating Stakeholder

Any person or entity that is not a WECC Member, but who has applied for and been granted participating stakeholder rights as defined and currently set forth in the WECC Bylaws.

Regional Reliability Standard (RRS)

A requirement approved by FERC under Section 215 of the Federal Power Act, to provide for reliable operation of the Bulk Electric System in the United States. Regional Reliability Standards are specific to the Western Interconnection and shall be established using these

Procedures. When approved by FERC and applicable authorities in Canada and Mexico, Regional Reliability Standards shall be made part of the body of NERC Reliability Standards and shall be enforced upon all applicable Bulk-Electric System owners, operators, and users within the WECC area, regardless of membership in the region.

Standard Authorization Request (SAR)

The WECC form titled *Standard Authorization Request (SAR)* administrated by the WECC Standards Department for the purpose of requesting development, revision, retirement, or interpretation of an RRS or OP.

Standards Briefing

Any meeting initiated by WECC for the purpose of creating an open forum for discussion and explanation of an RRS or OP, generally but not exclusively held during the development process of those documents in advance of a ballot window.

Standards Email List (SEL)

Email list(s) established and maintained by WECC for the purpose of communicating due process activity; generally, but not exclusively, for standards-related activities.

Substantive Changes

A Substantive Change is one that changes the scope, applicability, intent of the document, or the actions required by affected entities.

For example, Substantive Changes include but are not limited to:

- changes to the functional entities listed in the applicability section of the RRS or OP;
- changes to the effective date;
- adding, deleting or revising requirements, measures or explanatory narrative.

Substantive Changes to an RRS or an OP require at least one posting / comment / response cycle.

WECC Member

Any entity that has applied and been accepted for membership in WECC and is current in the payment of dues.

WECC Standards Committee (WSC)

Committee established by the WECC Board of Directors (Board) for the purpose of overseeing the implementation of these Procedures pursuant to its Board-approved charter.

Overview

This document has two dominate sections. The first section describes the development steps for the Normal Process for Regional Reliability Standards and Other Projects. The second section augments the first with Supporting Processes to address exceptions such as an expedited process for urgent actions, addressing regulatory directives, and maintenance of certain documents.

Development Steps/Table of Contents

The following development steps are included in the normal process for Regional Reliability Standards and Other Projects section:²

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The following related processes are included in the Supporting Processes section:

- Expedited Process for Urgent Action
- Regulatory Directives

² This Table of Contents will reflect the final actual pagination after final formatting. This footnote will be deleted from the final document.

- Maintenance of Procedures
- Maintenance of RRSs and OPs Documents

Notices

Notices required under these Procedures shall be distributed electronically via WECC's SEL(s) and deemed delivered when posted on the WECC website, except as noted in the following paragraph. Concurrent running of notice and posting periods is explicitly allowed.

WECC shall provide notice to NERC of all standards-related activities by including NERC on WECC's SEL. Inclusion of a NERC-provided email address on the related SEL shall constitute coordination of notice to NERC of standards-related activities and shall be deemed delivered upon dispatch via the SEL(s).

All WECC Members and Participating Stakeholders will be given an opportunity to receive notices provided via the SEL.

WECC Standards Committee (WSC)

The WSC manages these Procedures. The WSC protects the integrity, credibility and implementation of the Procedures while acting in accordance with the WSC Charter. Delineation of specific WSC duties, WSC composition and governance, WSC voting privileges, and other related practices, shall be in accordance with the WSC charter as approved by the Board.

WECC Standards Voting Sectors

There are eight (8) Standards Voting Sectors (SVS) in which an entity may register to vote. The SVSs are divided into two separate categories: Registered and Non-Registered.

The Registered category is for those entities *registered* on the NERC Compliance Registry and to those Canadian and Mexican entities that perform functions that, if performed in the United States, would allow those entities to be registered for compliance in the NERC Compliance Registry. The Non-Registered category is for all others meeting the qualifications of those defined SVSs. A single entity cannot be in the Registered category and the Non-Registered category at the same time.

SVSs 1 through 5 are "Registered" SVSs.

- 1) Transmission Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Transmission Owners, Transmission Operators, Transmission Service Providers, or Transmission Planners;
- 2) Generation Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Generation Owners or Generation Operators;

- 3) Marketers and Brokers Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Purchasing-Selling Entities.
- 4) Distribution Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Distribution Providers or Load-Serving Entities;
- 5) System Coordination Sector. This sector consists of Western Interconnection entities registered in the NERC Compliance Registry as Balancing Authorities, Reserve Sharing Groups, Planning Authorities/Coordinators, Resource Planners, Interchange Authorities/Coordinators, or Reliability Coordinators.

SVS 6 through 8 are “Non-Registered” SVSs.

- 6) End-Use Representative Sector. This sector consists of entities not on the NERC Compliance Registry, but that are WECC Members and are end users of significant amounts of electricity in the Western Interconnection, including; industrial, agricultural, commercial and retail entities as well as organizations in the Western Interconnection that represent the interests of a substantial number of end users or a substantial number of persons interested in the impacts of electric systems on the public or the environment.
- 7) State and Provincial Representatives Sector. This sector consists of entities not on the NERC Compliance Registry, but that are WECC Members that are representatives of states and provinces in the Western Interconnection provided that such representatives will have policy or regulatory roles and do not represent state or provincial agencies and departments whose function involves significant direct participation in the market as end users or in Electric Line of Business activities.
- 8) Other Non-Registered WECC Members and Participating Stakeholders Sector. This sector consists of (1) Participating Stakeholders as defined in the WECC Bylaws, (2) WECC Members not on the NERC Compliance Registry that are Electric Line of Business entities doing business in the Western Interconnection that do not own, control or operate transmission or distribution lines in the Western Interconnection, including power markets, independent power producers, any other entities whose primary business is the provision of energy services, and (3) those entities that are not eligible for membership in any other Standards Voting Sector and who have a substantial interest in the purposes of WECC.

If a single entity qualifies for more than one Registered SVS, that entity may register and vote in each Registered SVS for which it qualifies. For example, if a single entity was registered in the NERC Compliance Registry as a transmission owner and also a generator owner; that single entity could register and vote once in SVS 1 and once in SVS 2.

Non-Registered SVSs 6 through 8 represent those entities that are *not registered* in the NERC Compliance Registry. Unlike Registered SVSs 1 through 5, entities in Non-Registered SVSs 6 through 8 are only eligible to register and vote in a single SVS.

Normal Process for Regional Reliability Standards and Other Projects

Step 1 – Submit and Validate a Standard Authorization Request

Development, revision or retirement of a Regional Reliability Standard (RRS) or Other Project (OP) shall be initiated by the filing of a Standard Authorization Request (SAR) by any person or entity. A SAR is filed by completing the electronic fields of the online WECC SAR form. WECC staff shall review the incoming SAR to ensure it is valid. Once deemed valid, the SAR shall be immediately posted on the WECC website and notification shall be sent to the SEL.³

Step 2 – Complete SAR and Present to the WSC

WECC staff shall assign a unique tracking number to each SAR. The unique tracking number shall be used to identify the SAR throughout the development and archival processes. The SAR and those documents developed in response to the SAR shall be publicly accessible on the WECC website.

WECC staff shall determine within 30 days of receipt whether a SAR is complete. WECC staff may assist with completing the SAR, or report to the WSC that the SAR is incomplete and request guidance.

To be deemed complete, each SAR shall contain a description of the proposed RRS or OP subject matter sufficiently detailed to clearly define the purpose, scope, impacted parties, requirements and any other information relevant to the proposed RRS or OP.

Once deemed complete by WECC staff, WECC staff shall notify the WSC that the SAR has been received and is complete, and shall place the SAR on the agenda for the next scheduled WSC meeting for disposition, subject to required notice. Notice of WSC meetings and posting of WSC agendas will be provided in accordance with the WSC Charter.

The WSC shall determine whether the SAR is within the scope of WECC's authority and activities, and is appropriate for development. The WSC shall make that determination within 60 days of the date that the SAR is received by WECC, except where the SAR has been remanded, in which case the WSC shall make that determination within 30 days of receiving the curative SAR. Public comment on the SAR will be reviewed and considered by the WSC during a duly noticed WSC meeting prior to the WSC approving the SAR.

³ A "valid" SAR is different than a "complete" SAR. A SAR is deemed valid by staff as a threshold review that filters out spam and unwanted nuisance documents that may be received via an open website portal. Whether a SAR is "complete" is addressed in Step 2.

The WSC shall ensure that the SAR provides enough information that a Drafting Team (DT) will have a clear understanding of the reasons for, and nature of, the RRS or OP to be developed. The SAR author may be asked to further assist in the development or clarification of the SAR.

The WSC may accept the SAR, in which case development proceeds to Step 3.

The WSC may remand a SAR if it determines the content of the SAR is deficient. If the SAR is deemed deficient, the WSC shall specify the deficiency identified in the SAR and suggest potential remedies as part of its remand. WECC staff will make reasonable efforts to assist the SAR author in addressing the deficiencies identified by the WSC.

The SAR author shall have 30 days from the date of remand or until the 60th day following submittal of the SAR, whichever is longer, to remedy each deficiency identified in the remand, or withdraw the SAR.

If the deficiencies are remedied, WECC staff will resubmit the SAR to the WSC for disposition. If the deficiencies are not remedied within the allotted period: 1) the SAR will be deemed incomplete, 2) no further developmental action will be taken on the SAR, and 3) the SAR will be archived. The SAR author may submit a new SAR without prejudice based on the same or similar fact pattern.

The WSC may reject a SAR if it determines the SAR is outside the scope of WECC's authority or is not appropriate to be undertaken by WECC. If a SAR is rejected, the WSC shall post its explanation for rejection on the WECC website. Notification of the WSC's decision shall: 1) be communicated to the SAR author, the Board, and the Standards Email List (SEL), 2) reference the unique SAR tracking number and direct the recipient to supporting information as appropriate, and 3) be made no more than 30 days from the date of the WSC's determination. The WSC's decision to reject a SAR may be appealed to the Board.

Step 3 – Convene the Drafting Team

If it accepts a SAR, the WSC may, at its discretion, expand or narrow the scope of the SAR. The WSC shall prioritize the development of the SAR in relation to other RRSs or OPs proposed for development under the Procedures, as may be required based on the volume of requests and resources. If prioritization dictates a postponed starting date, the WSC shall either set a postponed starting date or set a review date upon which the WSC shall re-evaluate the SAR for purposes of its progress through these Procedures. In no case shall the review date be more than 180 days after the date the SAR was received.

Upon establishing a start date for the development of an RRS or OP, the WSC shall convene a DT to develop the RRS or OP required by the SAR. The WSC may either directly assign a DT or solicit team member nominations from the industry. The WSC shall approve the DT membership within 60 days of establishing a start date. The WSC may augment or modify DT membership at any time as needed.

Because the DT chair's primary responsibility is leadership and coordination, the DT chair need not be a SME in the field associated with the SAR.

Names of DT members will be posted on the associated project development website.

The WSC should provide to the DT a proposed starting date and an expected completion date.

Step 4 –Begin Drafting Phase and Submit Draft to WSC

All DT meetings shall be open and publicly noticed on the WECC website.

The DT will begin working on the documents required by the SAR following assignment by the WSC. Notice of each DT meeting shall be posted on the WECC website for a minimum of 15 days prior to the meeting.

The author of the SAR may participate in the drafting process. The author of the SAR may be asked to provide additional information, supporting studies, and other information to support the requirements of the proposed RRS or OP.

An RRS shall include those sections mandated by NERC, such as an applicability section, effective date, mandatory requirements, affected time horizons, measures, compliance, violation risk factors (VRF), and violation severity levels (VSL).

Each RRS shall promote at least one reliability principle and be consistent with all reliability principles and NERC market interface principles. Each RRS shall provide for as much uniformity as possible with reliability standards across the interconnected Bulk-Power System of the North American continent. An RRS shall be more stringent than a continent-wide reliability standard, include a regional difference that addresses matters that the continent-wide reliability standard does not, or shall be a regional difference necessitated by a physical difference in the Bulk-Power System.

An RRS or OP may include a guidance section, background section or other narrative sections; however, these sections are not required. Incorporation of extrinsic documents into an RRS or OP should be avoided.

An RRS or OP may include new definitions of terms that need to be added to the WECC or NERC glossaries. Wherever possible, DTs are encouraged to use existing defined terms rather than create new defined terms.

In drafting the applicability section of an RRS, only those functional entities listed in the currently approved NERC Functional Model shall be used. When drafting the applicability section of an OP, use of the NERC Functional Model is not required. Development of an OP should conform to WECC internal policies and practices, unless otherwise specified herein.

In the course of its assignment, the DT shall, at a minimum:

- Review any preliminary technical assessment provided with the SAR;
- Perform or request additional technical studies as needed;
- Prepare supporting documents to support the RRS or OP as needed; and
- Request from the WSC additional time to develop the RRS or OP, if necessary.

Step 5 – Post for Comment

Upon completion of each iterative draft of the RRS or OP, WECC staff shall facilitate the posting of the draft RRS or OP on the WECC website, along with supporting documents, if any, for a comment period of no less than 45 days for the first iteration and no less than 30 days for each iteration thereafter, except as allowed in the Expedited Process for Urgent Action section of these Procedures.

An implementation plan shall be included in at least one iterative posting during the development of the RRS or OP and shall be a part of the final record for consideration prior to ballot.

A notice that the comment period has been opened shall be distributed via the SEL. The notice shall include, at a minimum, the following information:

- Identification of the RRS or OP;
- What action is being taken (e.g., request for 30- or 45-day comment);
- The location of the document for review;
- How to submit comments or perform the requested action; and
- The opening and closing dates during which the solicited action shall take place. Unless otherwise posted, all posting periods close at 5:00 p.m. (Mountain).

WECC shall open a Web portal to serve as the sole means of receiving comments on the RRS or OP. Comments received via other media or received outside of the posted comment period will be accepted at the discretion of the DT. Comments may be submitted by any individual or entity, or a group of parties with a common comment. To streamline the process, if a group of parties elects to submit a common comment, those parties are encouraged to submit that common comment only once and append to the comment the names of all those individuals, entities or groups that are in support of the common position. DTs are charged to give due weight to such a joint comment and not to view the comment as having been received by a single individual or entity.

The WSC shall monitor each posting and review the posted documents to determine whether the DT remains within the scope of the SAR. At any time prior to opening a Ballot Pool, if the WSC concludes that the proposed RRS or OP is not within the scope of the SAR or does not meet other regulatory requirements or directives, the WSC shall either remand the RRS or OP to the DT with a specific explanation identifying the deficiencies that must be remedied, adjust the scope of the SAR, or retain the SAR as drafted and replace the DT.

Upon receiving the remanded RRS or OP and explanation of deficiencies, the DT shall

initiate a redraft following the steps contained in these Procedures. If a new DT is assigned, the new DT shall start the development efforts at Step 4 of these Procedures.

Step 6 – Respond to Comments

The DT shall consider all comments submitted in accordance with these Procedures. If the same comment is provided more than once, the DT may provide a single response to all comments that raise the same or a similar concern.

The DT shall prepare a summary of the comments received and the changes made to the proposed RRS or OP as a result of comments received. The DT shall summarize comments that were rejected by the DT, in whole or in part, and the reason(s) that these comments were rejected. The summary, along with a response to each comment received, will be posted on the WECC website no later than the next posting of the proposed RRS or OP.

All parties submitting comments are encouraged to participate in the DT meetings during which responses to their comments are considered and drafted.

The DT should target posting its responses to the WECC website no later than 30 days after the comment window has closed. If more than 30 days are required, the DT chair shall advise the WSC chair of the DT's progress and request additional assistance as needed.

Substantive Changes

If the DT determines that comments received during any posting warrant a Substantive Change to the language of an RRS or OP, the DT shall consider each comment and redraft the RRS or OP accordingly, repeating the posting / comment / response cycle as many times as needed to address the Substantive Changes while staying within the scope of the SAR.

If at any time during the development process the DT determines that the scope of the SAR should be adjusted, the DT shall present that request to the WSC for disposition.

If at any time during the development process the DT determines that it has reached a developmental impasse, the DT shall present the issue to the WSC for disposition.

If comments received during any posting do not warrant a Substantive Change to the language of an RRS or OP, the DT shall be polled at a regularly scheduled and announced DT meeting and asked whether the RRS or OP should be forwarded to the WSC with a recommendation to ballot the document. If the DT concludes by an affirmative majority vote that the RRS or OP should be forwarded to the WSC with a recommendation for ballot, the document will be forwarded accordingly.

Non-Substantive Changes

These Procedures acknowledge that a Non-Substantive change may be discovered at any point during or after the final development of the RRS or OP.

Non-Substantive Changes to an RRS shall be handled in accordance with the NERC Standards Development Manual or its successor.

Non-Substantive Changes to an OP shall be addressed using WECC's internal policies and practices. Non-Substantive changes for OPs do not require a comment / response cycle.

Step 7 – Submit Proposed Draft to the WSC with a Request for Ballot

Upon completion of the proposed RRS or OPs, the DT shall present the proposed RRS or OPs to the WSC with a request for ballot. The WSC shall address that request no later than its next regularly scheduled meeting.

After receiving a request for ballot, the WSC shall review the RRS or OP as presented and determine whether it fulfills the requirements stated in the SAR. The WSC shall also consider whether extrinsic requirements, such as FERC orders, Board directives, or other regulatory directives are met by the content of the document.

If the WSC concludes that the proposed RRS or OP is ready for ballot, the WSC shall forward the RRS or OP to WECC staff with a request that a Ballot Pool be formed from the Ballot Body, for the specific intent of seeking approval of the proposed RRS or OP. The results of the WSC's vote to forward the RRS or OP to the Ballot Pool shall be documented. Any WSC member that opposes submittal of the RRS or OP will be encouraged to provide dissenting comments, and if possible, specific language that would make the draft document acceptable to the dissenting member. If the WSC cannot reach agreement to submit the RRS or OP to the Ballot Pool, the WSC will report to and seek guidance from the Board.

If the WSC concludes that the proposed RRS or OP is not ready for ballot because it does not fulfill the requirements of the SAR or because it fails to meet other regulatory requirements or directives, the WSC shall remand the RRS or OP to the DT with a specific explanation identifying the deficiencies that must be remedied.

Upon receiving the remanded RRS or OP and explanation of deficiencies, the DT shall:

- 1) Redraft the RRS or OP accordingly;
- 2) Initiate iterative comment / response cycles as needed until it again concludes that no further Substantive Changes are needed; and
- 3) Return the proposed RRS or OP to the WSC for disposition.

Step 8 – Convene a Standards Briefing

Once the WSC approves submitting the RRS or OP to the Ballot Pool for ballot, WECC shall dispatch notice to the SEL that a Standards Briefing will be held to discuss the content of the proposed RRS or OP prior to balloting. Notice shall be provided 15 days or more before

the Standards Briefing is to be held and shall provide, at a minimum, the following:

- Identification of the RRS or OP;
- The time and place of the Standards Briefing; and
- The location of the proposed RRS or OP and related documentation for review.

Step 9 – Form the Ballot Pool and Ballot the Standard

Any individual or entity seeking participation in the ballot of an RRS or OP shall apply to WECC for Ballot Body membership in any SVS in which it is eligible. WECC staff shall review the request and confirm eligibility to join the Ballot Body.

Decisions of the staff to approve, deny, or restrict the admission of an individual or entity to a voting sector may be appealed in accordance with the WECC Bylaws.

From the Ballot Body, a discrete Ballot Pool will be formed for each RRS or OP to be balloted under these Procedures. All members of the Ballot Body shall be provided an opportunity to opt into a Ballot Pool formed for purposes of voting on each RRS or OP. It is the Ballot Pool that votes on RRSs and OPs developed under these Procedures.

Notice that a Ballot Pool is forming will be dispatched via the SEL. That notice shall contain, at a minimum, the following information:

- 1) Identification of the RRS or OP;
- 2) The proposed action to be taken (e.g., Notice of Ballot Pool Formation / Notice of Ballot);
- 3) When the Ballot Pool will open;
- 4) When the ballot will take place;
- 5) How to cast a vote; and
- 6) The location of the proposed RRS or OP and related documentation for review.

The Ballot Pool registration window shall remain open for a period determined by WECC staff, but in no case shall the Ballot Pool registration window be open less than 15 days or more than 30 days.

Once notice of a Ballot Pool forming has been dispatched: 1) the ballot window shall commence no sooner than 15 days and no later than 45 days after that dispatch; and 2) no Substantive Changes may be made to the proposed document unless the revisions are posted for an iterative comment / response cycle and a new date is set for ballot.

Once the ballot window opens, no Ballot Body member may join or withdraw from the Ballot Pool. The WECC Director of Standards (DOS) may authorize deviations from this rule for extraordinary circumstances such as the death, retirement, or disability of a Ballot Pool member that would prevent an otherwise eligible entity from casting a vote during a given ballot window.

Voting on an RRS or OP shall be via electronic voting administered on the WECC website.

The default voting window shall be a period of 15 days; however, the window may be held open up to a maximum of 60 days to reach a quorum. During a ballot window, WECC shall not sponsor or facilitate public discussion of the standard to be balloted.

Eligible members of the Ballot Pool may cast one vote in each SVS for which they are eligible.

Participating Stakeholders may only vote on an RRS if they have applied for and been granted Participating Stakeholder status. A Participating Stakeholder is only entitled to vote on an RRS and may only vote on a WECC Criterion if the proposed WECC Criterion could result in sanction to a non-WECC Member. A Participating Stakeholder is not entitled to vote on any other OP.

Each member of the Ballot Pool casting a negative vote on an RRS or OP will be required to provide a statement explaining the reason for the negative vote. The statement should include language that would make the RRS or OP acceptable. The statement will be included in the voting record for consideration by the WSC and the Board.

A two-thirds (2/3) quorum of the Ballot Pool is required for each vote. Quorum shall be based on the total number of Ballot Pool members and shall not be based on the total number of votes cast. Abstentions and negative votes cast without an explanation shall not be counted for the purpose of determining consensus, but will be counted for purposes of obtaining a quorum.

A weighted majority vote of the Ballot Pool is required for an RRS or OP to be approved. Voting among the SVSs shall be weighted as follows:

- For each SVS with 10 or more voters, the number of affirmative votes cast shall be divided by the sum of the affirmative and negative votes cast to determine the fractional affirmative vote for that SVS.
- For each SVS with less than 10 voters, the same process shall be used to determine the fractional affirmative vote, but the fractional affirmative vote of that SVS shall be multiplied by 10 percent times the number of voters.
 - For example, for SVSs with nine voters, the fractional affirmative vote will be multiplied by 90 percent.
- The sum of the fractional affirmative votes from all SVSs divided by the weighted number of SVSs voting shall be used to determine if a weighed majority has been achieved and whether the RRS or OP has been approved. An SVS shall be considered as voting if any member of the SVS in the Ballot Pool casts either an affirmative or a negative vote. If there are more than ten voters in the SVS, the weighting used for the calculation of “weighted sectors voting” shall be 100 percent. For SVSs with less than ten voters, the weighting used for the calculation of the “weighted sectors voting” shall be 10 percent per voter.

- An RRS or OP shall be deemed approved by the Ballot Pool if the sum of fractional affirmative votes from all SVSs divided by the weighted number of voting SVSs is a majority (i.e., greater than 50 percent).

After a vote by the Ballot Pool, the WSC shall take one of the following actions.

If the Ballot Pool approves an RRS or OP, the WSC shall submit the RRS or OP to the Board for approval. The WSC shall provide voting results to the Board, including the final ballot results and any rationale supporting any negative votes cast.

Any RRS or OP that was provided to the Board for approval will be posted for Board review for at least the period mandated by the WECC Bylaws.

If the Ballot Pool rejects the RRS or OP, the SAR shall be deemed complete and all associated documents shall be archived, except as allowed in the Regulatory Directive section of these Procedures.

Step 10 – Initiate the Appeals Process – If Needed

An appeal may be brought on the basis of either a technical (reliability) concern or a due process (procedural) concern.

If the appeal is based on technical grounds, that appeal may be brought at any stage of the development process prior to the opening of a ballot window. The appeal shall be submitted to the DOS who shall place the appeal on the agenda of the next regularly scheduled WSC meeting. If the appellant does not concur with the WSC's findings, the appellant may request that the DOS forward the matter to the Board for disposition.

If the appeal is based on due process concerns, the appellant shall submit the matter to the DOS no later than 30 days after the alleged occurrence of the due process violation, but in no case shall an appeal on due process grounds be accepted more than 30 days after the RRS or OP has been approved by the Ballot Pool. The appeal shall be submitted to the DOS who shall place the appeal on the agenda of the next regularly scheduled WSC meeting. If the appellant does not concur with the WSC's findings, the appellant may request that the DOS forward the matter to the Board for disposition.

The filing of an appeal shall not halt the development process; however, the appeal shall be settled by the Board before the Board votes to approve the RRS or OP.

Step 11 – Obtain Board Approval

The Board shall consider the RRS or OP for approval no later than at its next regularly scheduled meeting after the close of the Ballot Pool window and recommendation for approval by the WSC, subject to the notice requirements in the WECC Bylaws.

Any person or entity may submit comments to the Board for the Board's consideration. The

Board shall consider:

- 1) All comments submitted for its consideration;
- 2) The WSC's recommendations and minority opinions, if any;
- 3) All comments that were not incorporated into the RRS or OP;
- 4) Voting results including, at a minimum, the final ballot results and any rationale supporting negative votes; and
- 5) Any other supporting documentation.

If an OP is approved by the Board, WECC shall post the final OP on its website and the SAR will be deemed complete. The effective date will be that approved by the Board.

If an RRS is approved by the Board, WECC shall forward the RRS to NERC for NERC and FERC disposition.

If the RRS or OP is not approved by the Board, the Board may either deem the SAR complete or remand the RRS or OP to the DT with specific guidance as to proposed changes.

If the RRS or OP is remanded, any Substantive Changes must be vetted in accordance with these Procedures. Under no circumstances shall the Board make Substantive Changes to the RRS or OP, except in accordance with its backstop authority as authorized by the WECC Bylaws.

Step 12 – Submit RRSs for ERO Review, FERC Approval & Implementation of WECC Regional Reliability Standards

Note: Step 12 only applies to RRSs.

All new, revised, or retired RRSs shall be submitted to NERC for NERC and FERC approval. The approval, revision or retirement of an RRS shall not be effective in the United States until approved by FERC and shall not be effective in another jurisdiction until approved by the applicable governmental authority.

Step 13 – Retire an OP

Upon determining that the subject matter of an OP is duplicated in a NERC Reliability Standard, and that retirement of the OP will not cause a reliability gap after the effective date of the associated NERC Reliability Standard, the WSC may retire a WECC OP on its own initiative without further due process.

Step 14 – Submit a Request for Interpretation

A Request for Interpretation (RI) of a document developed under these Procedures is limited to clarifying existing requirements in the approved document and may not expand

upon a requirement or provide guidance on how to implement a requirement.

The RI is initiated by submitting WECC's online SAR form. The SAR shall: 1) identify the specific document; 2) identify the requirement within that document for which an interpretation is being requested, and 3) specify the perceived lack of clarity. The SAR shall indicate the material impact to the requesting entity or others caused by the perceived lack of clarity.

The RI is processed using the same process set forth in these Procedures with the following exceptions:

- The chair of the WSC shall assemble an Interpretation Drafting Team (IDT). The IDT shall be composed of SMEs with relevant expertise to address the clarification and, to the extent possible, should include members of the original DT. The IDT shall not include any team member representing the entity that filed the RI; however, this prohibition does not preclude representatives of the filing entity from participating in the development process.
- If all of the document is to be subsumed into the new PSS RRS the PSS DT should recommend to the Standing Committee that the document be retired as of the effective date of the replacement document.
- Once an interpretation of an RRS has been approved by the Board, the interpretation shall be appended to the RRS and submitted to NERC for NERC and FERC approval. The interpretation will remain appended to the RRS until such time as the RRS is revised and the interpretation's content is addressed during the revision process. RRS interpretations shall not be effective in the United States until approved by FERC and shall not be effective in other jurisdictions until approval by the applicable governmental authority.

Supporting Processes

Expedited Process for Urgent Action

In cases requiring urgent action, such as in the development of emergency procedures, any person or entity may propose an interim RRS or OP for approval by the WECC Board. The RRS or OP must go through a process that eliminates any or all of the steps outlined previously, but only to the extent deemed necessary by the Board and only in a manner that is consistent with the WECC Bylaws.

If the Board approves the interim document, it shall establish an initial effective date for the interim document.

Within 90 days after the initial effective date of the document, the Board shall either:

- 1) Cause a SAR to be submitted requesting the development under these Procedures of a permanent replacement to the interim document; or

2) Shall extend the applicability of the interim document for an additional 90 days.

Renewal may occur more than once, but a good faith effort must be made to develop a permanent replacement under these Procedures.

If a SAR is submitted, the interim RRS or OP shall remain in effect until the permanent replacement RRS or OP becomes effective.

If a SAR is not submitted and the interim RRS or OP has not been extended, the interim RRS or OP shall be deemed retired.

Regulatory Directives

These Procedures acknowledge that FERC may order WECC to make specified regulatory changes to documents created under these Procedures. For the purpose of this section only, those documents are referred to as Directive Regional Reliability Standards (DRRS).

If the Board determines that these Procedures failed to result in a DRRS meeting the mandated regulatory changes, the Board shall have authority to take the following actions to ensure that the DRRS is responsive to the regulatory directive.

If the Ballot Pool approves a DRRS that does not address a regulatory directive required to be included in that document, the Board may remand the DRRS to the original DT or instruct the WSC to convene a new DT to redraft the document. The Board shall instruct the DT on the specific regulatory directive that must be contained in the redraft. Once the DRRS is redrafted it shall be reprocessed under these Procedures.

If the Ballot Pool rejects a DRRS or fails to ballot the DRRS due to failure to reach a quorum, either when first presented for ballot or during an iterative redraft as instructed by the Board, the Board shall review the DRRS, including all comments provided and all rationale accompanying any negative vote.

Upon a finding that the DRRS was rejected for reasons not related to the regulatory directive, the Board may direct WECC staff to file a new SAR with the specific narrow scope of addressing only the regulatory directive. The Board may suggest specific language for inclusion in the proposed DRRS.

Upon a finding that the DRRS was rejected based on language addressing the regulatory directive, the Board shall take the following steps to meet its regulatory obligation:

- 1) Review the entire record of development.
- 2) Require a public technical conference to be noticed and convened to determine whether the rejected DRRS is:
 - just and reasonable;
 - not unduly discriminatory or preferential;
 - in the public interest;

- helpful to reliability;
 - practical;
 - technically sound;
 - technically feasible;
 - cost-justified; and
 - meets the regulatory directive (hereafter “Just and Reasonable”).
- 3) Determine whether the DRRS should be implemented as drafted, notwithstanding rejection by the Ballot Pool.

Upon a finding that the rejected DRRS should be implemented, the Board shall approve the DRRS and direct that it be submitted to NERC for NERC and FERC approval, as required.

Upon a finding that the rejected DRRS should not be implemented, the Board may submit the DRRS and its record of development as a regulatory compliance filing in response to the regulatory directive. The filing shall include a recommendation that the DRRS not be made effective and an explanation of the basis for that recommendation.

Maintenance of the Procedures

The WSC is charged with maintenance of these Procedures. Proposed changes to these Procedures shall first be brought to the WSC for consideration. The WSC may initiate proposed changes on its own initiative.

If it determines that a change to these Procedures should be pursued, the WSC shall draft the proposed changes and post the proposed changes to the WECC website for comment, accompanied by a notice to the SEL soliciting comments on the proposed changes.

The WSC shall consider all comments received and shall redraft the proposed changes as it deems necessary. Once the WSC approves the proposed changes, those changes shall be submitted to the Board for approval. Changes to these Procedures approved by the Board shall be submitted to NERC for NERC and FERC approval.

Maintenance of RRS and OPs Documents

The WSC shall ensure that each RRS is reviewed at least once every five years from the effective date of the most recent version of the RRS. If the review identifies needed changes, the WSC shall cause a remedial SAR to be filed. If the review does not identify needed changes, the WSC shall communicate its decision via the SEL and no further action will be required.

Review of OPs shall be conducted in accordance with internal WECC policies and procedures.